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VIA ECFS

February 20, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: EX PARTE FILING

CG Docket No. 03-123 - In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; CG Docket No. 10-51 – Structure and Practices of the Video Relay Service Program

Dear Ms. Dortch:

Telecommunications for Deaf and Hard of Hearing, Inc., National Association of the Deaf and the Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing at Gallaudet University (the "Consumer Groups") submit this letter regarding the proposal to require VRS providers to establish log-in procedures for VRS users in connection with the use of public videophones and enterprise videophones not located in private workspaces.¹

The Consumer Groups urge the Commission to refrain from imposing, at this time, a log-in requirement for public videophones. Rather, the Commission should refer the matter to the iTRS Advisory Council to work with the TRS Fund Administrator on potential means to validate VRS calls from public videophones. While the FCC should take reasonable steps to prevent fraud or abuse, as explained below, the proposed log-in requirement for public videophones will be burdensome to consumers and the benefits do not outweigh those burdens.

A log-in requirement for public videophones that obliges users to input information (e.g., both the user's iTRS number and a personal identification number) to authenticate calls would be burdensome for multiple reasons. VRS users may have to provide sensitive information to a VRS provider to establish a PIN or passcode in addition to personal information that VRS users must provide to VRS providers for the User Registration Database (URD). Consumers have

¹ See *Structure and Practices of the Video Relay Service et al.*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd 2436 at ¶ 119 (2017).

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previously expressed concerns about providing personal information² and providing additional log-in information raises concerns about VRS providers keeping the applicable authentication mechanisms secure. The FCC should give the URD launch some time before implementing any additional requirement for users to provide information to make VRS calls.

Users would need to retain applicable log-in information to be used for those occasions – which may be few and far between for many users – when they need to make a call from a public videophone. Retaining applicable log-in information could be challenging for any VRS user and especially for VRS users with cognitive disabilities (even if log-in information is written on a piece of paper and carried with a user).

Some users who use public videophones may not be URD-eligible (e.g., homeless, consumers that cannot afford home broadband service, minors, immigrants). The proposed log-in should facilitate a work-around for any URD-ineligible user.

Furthermore, traffic from public videophones comprises an extremely small portion of all VRS calls.³ As a result, the potential for fraud or abuse of public videophone usage should be proportionately small if not *de minimis*. Given this, the need for a log-in requirement for public videophones at this time does not outweigh burden to consumers.

Accordingly, the Consumer Groups ask the FCC to refrain, at this time, from imposing a log-in requirement for public videophones. They also ask the FCC to refer the matter to the iTRS Advisory Council to work with the TRS Fund Administrator on potential options to validate VRS calls from public phones that will not be so burdensome to consumers.

Please feel free to contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Danielle Burt

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² See e.g., Consumer Groups' Joint Petition, CG Docket Nos. 10-51 and 03-123, dated October 1, 2015.

³ See e.g., Sorenson Communications, LLC Letter, CG Docket Nos. 10-51 and 03-123, dated January 26, 2018 (reporting 0.8%).

February 20, 2018

Page 3

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